

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50.

Defendants.

Civil Action No.
1:22-cv-00187-LJV-JJM

[PROPOSED] ORDER

Defendant Skyryse, Inc. (“Skyryse”) has submitted a motion to compel the production of documents from Plaintiff Moog, Inc. in response to Skyryse’s Requests for Production Nos. 5, 11, and 15. Having considered the parties’ papers in support of and opposition thereto, argument of counsel, and good cause appearing therefor, the Court hereby orders as follows:

1. Skyryse’s motion is GRANTED.
2. Within seven days of the entry of this Order, Moog shall produce all non-privileged documents responsive to Skyryse’s Requests for Production Nos. 5, 11, and 15:
 - a. RFP No. 5: All Documents and Communications relating to any confidentiality obligations owed to You by Your employees, Your customers, and/or Your suppliers, including, without limitation, Your efforts to investigate compliance with, and enforcement of, those confidentiality obligations.
 - b. RFP No. 11: All Documents and Communications regarding Moog’s internal research, programs, and projects related to automated helicopter flight, including but not limited to, the cessation of any research, programs, and projects.
 - c. RFP No. 15: All Documents relating to Your efforts to maintain the secrecy of the alleged Trade Secrets, including without limitation (i) Documents sufficient to identify all Persons who have accessed the alleged Trade

Secrets; and (ii) Documents sufficient to show the confidentiality obligations of each such Person to You.

Dated: _____

The Honorable Jeremiah J. McCarthy
United States Magistrate Judge